



Gregory P. Korn

Direct Dial: (310) 566-9807

Direct Fax: (310) 566-9877

E-Mail: gkorn@khiks.com

July 22, 2025

VIA ECF

The Honorable Jeannette A. Vargas
United States District Court Judge
Southern District of New York
500 Pearl Street, Room 703
New York, NY 10007
VargasNYSDChambers@nysd.uscourts.gov

Re: *Drew Dixon v. Antonio Marquis "L.A." Reid*, 1:23-cv-09878-JAV
Response To Letter Regarding Financial Discovery

Dear Judge Vargas:

I write on behalf of Defendant Antonio Marquis "L.A." Reid ("Reid") in response to the July 17, 2025 Letter to Court Regarding Financial Discovery filed by counsel for Plaintiff Drew Dixon ("Dixon").

While there is a split of authority in the Southern District of New York as to whether financial discovery relevant to punitive damages should be permitted before trial,¹ it was agreed, as I understand it, that such financial discovery would be conducted before trial in this case. All of the financial discovery that Dixon's counsel served has been provided to the client and/or his business manager(s) so that responsive documents can be identified and collected, and my partner, Ms. Holley, has been in contact with client representatives recently to continue requesting the documents. However, as is readily apparent from the July 17, 2025 letter from Dixon's counsel, the scope of the documents requested is exceedingly broad, and in some cases the discovery more resembles that which would be done in post-judgment debt collection proceedings than that which is done to establish a defendant's net worth for purposes of a punitive damages award.

¹ *Copantitla v. Fiskardo Estiatorio, Inc.*, 2010 WL1327921 at *16 (S.D.N.Y. Apr. 5 2010) ("Courts in this circuit are split on the issue of allowing pretrial disclosure of financial information relevant to a determination of punitive damages. Some permit it Others have found that such disclosure is premature.").

The Honorable Jeannette A. Vargas
July 22, 2025
Page 2

As Ms. Holley is currently out of the country, I am in the process of reaching out to Reid's business managers to further discuss the requests with the goal of producing as much of the requested documents as is possible in the next 7-10 days. In the meantime, we would welcome a conference with the Court to discuss a potential narrowing of the scope of the requests to focus on documents bearing on Reid's net worth.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Korn', with a stylized flourish at the end.

Gregory P. Korn